



November 5, 2013

The Honorable Daniel Ashe
Director, United States Fish and Wildlife Service
Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: United States Review of the Status of the African Lion

Dear Director Ashe:

Almost two years ago now, on November 16, 2011, the Safari Club International Foundation (SCIF) wrote to you on behalf of participants of the African Wildlife Consultative Forum (AWCF), which consists of community-based conservation NGOs, academics, professional hunting organizations, and representatives from eleven African nations where the lion lives. The letter expressed the concern of the participants about FWS's review, which had just started, of a petition to list the African lion as an endangered species under the Endangered Species Act. In brief, the letter made the following points, which the African governments continue to support:

1. On the recommendation of the United States, the status of the African lion is currently undergoing a CITES Periodic Review, which will involve the gathering of information from the range states and over 30 lion research scientists, and which will result in a determination as to whether the African lion should be uplisted to an Appendix I species. The AWCF participants therefore believe it "would be premature, unnecessarily costly and imprudent for FWS to [pursue] a parallel process to the ongoing Periodic Review."
2. Listing the African lion as endangered under the Endangered Species Act would make the importation of lion trophies into the United States illegal and thus discourage Americans from travelling to Africa to hunt lions. Hunters, particularly those from the United States, provide a vital source of revenue for conservation

measures and for local communities in hunting areas. Loss of hunters from the United States would have a negative impact on financial support for lion conservation and livelihoods in community districts. A decrease in revenue from hunting would also exacerbate the threats the lion is facing, particularly from human-lion conflict and poaching.

In addition to these points, we note that the best scientific information currently available does not support a finding that the African lion is currently “in danger of extinction.” A comprehensive study published just last year concluded that there are between 32,000 and 35,000 lions living in the wild in Africa.¹ The lion population is spread across 27 countries, with 9 countries having populations of at least 1,000 lions. Of greatest significance is the fact that 24,000 of the lions, which is at least 68% of the total population, live in what the study terms “strongholds.” “Strongholds” are areas that meet “the necessary requirements for [the] long-term viability” of the lion populations living there. To qualify as a “stronghold,” an area must meet three criteria; the area must:

1. contain a population of at least 500 lions;
2. be legally protected as lion habitat or be an area where hunting is managed; and
3. contain a population of lions whose numbers are either stable or increasing.

There are 10 such areas in Africa. According to the study, the lion populations living in these areas are “large, stable, and well protected,” and the populations are therefore “likely to persist into the foreseeable future.”

We members of the AWCF understand that a workshop was convened by the U.S. Fish and Wildlife Service to consider the conservation status of the lion. We understand that three lion experts whom the Service invited to address the workshop—Dr. Paula White, Director of the Zambia Lion Project, Jason Riggio, principal author of the study cited above, and Dr. Craig Packer of the University of Minnesota—were unanimous in their opinion that the lion is not currently “in danger of extinction.” While we are pleased to learn the messages provided by these experts, we are disappointed that Africa was neither consulted for expert opinions, nor invited to the workshop.

Based on our understanding of the workshop and the best available information, it should be apparent that there is no scientific basis for a finding that the African lion is endangered. We

¹ *The size of savannah Africa: a lion's (Panthera leo) view*, Jason Riggio, et al. (December 2012).

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therefore urge the Fish and Wildlife Service to bring its investigation to a rapid conclusion and to find that listing of the African lion is not warranted.

Respectfully,

A handwritten signature in blue ink that reads "JOE HOSMER". The signature is written in a cursive style with a large, sweeping initial "J".

Joseph H. Hosmer, President
Safari Club International Foundation

On behalf of the 12th Annual African Wildlife Consultative Forum attended by representatives of the following countries:

Botswana
Ethiopia
Mozambique
Namibia
South Africa
Swaziland
Tanzania
Zambia
Zimbabwe